

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Jason Nesbit, Stephanie Stordahl;)
Linda Hobbs and Shannon Charles)
Individually and on behalf of a class)
of similarly situated individuals)
Plaintiffs,) Case No.: 1:17-cv-01137
v.)
West Interactive Services Corporation,)
Defendant.)

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441(b), and 1446, Defendant, West Interactive Services Corporation (“West”), by their undersigned attorneys, hereby remove this action from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois. In support of this Notice of Removal, West states as follows:

1. Plaintiffs, Jason Nesbit, Stephanie Stordahl, Linda Hobbs and Shannon Charles, originally commenced this action by filing a Complaint in the Circuit Court of Cook County, Illinois, where it is presently captioned *Jason Nesbit, et al. v. West Interactive Services Corporation* - Case No.: 2017CH00916. No further proceedings before the state court have occurred.
2. In their Complaint, Plaintiffs allege federal statutory causes of action against West. Specifically, Plaintiffs allege violations of the Telephone Consumer Protection Act,

47 U.S.C. § 227 *et seq.*(“TCPA”). A true and correct copy of Plaintiffs’ Complaint is attached hereto as Exhibit “A.”

3. This Court has original federal question jurisdiction over Plaintiffs federal statutory claims pursuant to 28 U.S.C. §1331 and 28 U.S.C. § 1441.

4. West was served with the Complaint on or about January 25, 2017. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which West was served with Plaintiffs’ Complaint. 28 U.S.C. § 1446.

5. The Circuit Court of Cook County is located within the Northern District of Illinois. Therefore, venue for purposes of removal is proper because the United States District Court for the Northern District of Illinois embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

6. Notice of this Notice of Removal of this action is being immediately provided to the Clerk of the Circuit Court of Cook County, Illinois. *See Exhibit “B”.*

7. Written notice of this Notice of Removal of this action is also being caused to be served on Plaintiffs’ counsel, at the address provided on their Complaint.

WHEREFORE, Defendant, West Interactive Services Corporation, gives notice that this action is removed from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois.

Dated: February 13, 2017

Respectfully submitted,

/s/ Morgan I. Marcus

James K. Schultz
Daniel W. Pisani
Morgan I. Marcus
Attorney No.: 42522
Sessions Fishman Nathan & Israel, LLC
120 South LaSalle Street, Suite 1960
Chicago, Illinois 60603
Telephone: (312) 578-0990
jschultz@sessions.legal
dpisani@sessions.legal
mmarcus@sessions.legal

*Attorneys for Defendant
West Interactive Services Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of February, 2017, the foregoing **Notice of Removal** was electronically filed in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system as described below. Parties may access this filing through the Court's system. In addition, a copy of this document and all attachments are being delivered by regular mail to Plaintiffs' counsel at the following addresses:

Clerk of the Circuit Court
Richard J. Daley Center
50 West Washington Street
Chicago, Illinois 60602

Myles McGuire
Evan M. Meyers
Eugene Y. Turin
MC GUIRE LAW, P.C.
55 West Wacker Drive, 9th Floor
Chicago, Illinois 60601
Attorneys for Plaintiff

/s/ Morgan I. Marcus

*Attorneys for Defendant
West Interactive Services Corporation*